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**FORT CAMPBELL ENVIRONMENTAL HANDBOOK**  
**Guidance and Instruction**  
**ISSUANCE & USE OF A SECONDARY CONTAINMENT UNIT (SCU)**

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1. **Purpose and Scope:** Provide guidance and instruction on the issuance of a Secondary Containment Unit (SCU). Included are instructions for issuance of a SCU and containers for recycling Used Oil, Used Fuel, or Used Antifreeze.

2. **Reference:**

- a. Used oil/fuel that is being accumulated for recycling is regulated by 40 CFR 279.
- b. AR 200-1, Chapter 6, Section 6-14.d.
- c. 40 CFR 279.22 regulates Used Oil Storage and Containers.
- d. 40 CFR 112 regulates Spill Prevention, Control and Countermeasures (SPCC)

3. **Definitions:**

a. Secondary Containment: A method of preventing material from entering the environment should the primary container fail. Secondary containment units are available from the Environmental Division contact 798.3105.

b. Used Oil: Petroleum based products that have a flash point greater than 100 degrees F. The following make-up this category and may be accumulated and stored in the same container:

Motor oil	Brake fluid	Kerosene
Diesel fuel	Hydraulic fluid	JP-8
Transmission fluid	Synthetic Oils	Heating oil

c. Used POL: Used Oil and Recyclable Fuel.

d. Recyclable Fuel. The following make-up this category and may be accumulated and stored in the same container: unleaded fuel, MOGAS, and Coleman white fuel. Contaminated MOGAS at unit level will be stored in five gallon Jeri cans. This is due to the inability to pump out recyclable fuel with the pumper truck. Jeri cans will be transported to the PPOC at 2<sup>nd</sup> and Wickham by the unit and poured into the 5,000 gallon storage tank.

4. **General:**

a. Maintenance facilities producing used oil/fuel are required to set-up Petroleum, Oil, and Lubricants (POL) accumulation sites at their facilities for used oil/fuel recycling. The Resource, Conservation, and Recovery Act (RCRA) Part 279 requires that, as a minimum, the POL site have a secondary containment unit to prevent spills from entering the local environment.

b. A POL accumulation site is subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) (40 CFR 112) in addition to the requirements of 40 CFR 279.22 listed in this Guidance and Instruction requiring a secondary containment unit be utilized at all POL sites. As the generator, units and activities will not store used oil/fuel in containers other than tanks and containers subject to the above guidance

5. **Responsibilities:**

a. Commander/Activity Director: Provide command guidance and emphasis for the used POL management program within the unit and signatory authority for set-up of Used POL accumulation sites.

b. Environmental Quality Officer (EQO) shall:

**FORT CAMPBELL ENVIRONMENTAL HANDBOOK**  
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---

- 1) Sign-off on establishment of POL site memo (page 4) with the commander and inspect the site monthly.
- 2) Assist unit personnel with the management of used POL products.

c. The Environmental Division Hazardous Waste Program Manager (270.798.9763):

1) Authorizes establishment of the POL accumulation site and trains operators to manage the site IAW RCRA, 40 CFR 279.

- 2) Ensures unit/activity regulatory compliance with on-site inspections.

d. The Environmental Division Spill Response Program Manager (270.798.9601):

1) Ensures the unit/activity has an updated SPCC plan on-site site IAW 40 CFR 112 [Spill Prevention, Control and Countermeasures (SPCC)].

- 2) Ensures unit/activity regulatory compliance with on-site inspections.

e. The Pollution Prevention Operations Center, 2nd and Wickham (270.798.9076):

- 1) Requests the SCU for the unit/activity when necessary and delivers the SCU to the designated location.
- 2) Supplies containers (drums) for the unit/activity.

**6. Instruction:** Used oil is exempt from the hazardous waste stream, when recycled, and therefore does not require a Satellite Accumulation Point (SAP) as discussed in Tab 11. Establishment of the POL Accumulation Site includes the following:

a. The unit commander or activity director will select a POL site operator and send a signed memorandum to the Hazardous Waste Program Manager or his representative requesting establishment of a POL site at their maintenance facility. The unit/activity EQO will also endorse this memo confirming their knowledge of the new site and to provide necessary unit/activity training on-site. A preformed memo is available from the Hazardous Waste section of the P2 Branch (270.798.9763) and is included in this G&I.

b. This memo will include a site plan showing the location of the SCU at the maintenance facility. The memo and site plan will be taken by the POL site operator to the Environmental Division, Pollution Prevention Branch (Building 2186), located on 13 ½ Street and Indiana Avenue in the vicinity of the Estep Wellness Center.

c. The Hazardous Waste Program Manager or his representative will instruct the operator on the proper set-up and operation of the POL site. The operator will then be issued a "Used POL and Used Antifreeze Accumulation Points Procedures" poster and the compliance POL site inspection will be explained.

d. Verification of the maintenance facilities SPCC will be conducted and the memo for the POL site will be forwarded to the PPOC representative for purchase or issue of the SCU.

e. A SCU can be hand-receipted to a unit or activity by the environmental division, if used SCU is available. If a used SCU is unavailable, the commander will authorize purchase of a new SCU, in writing, to the PPOC representative. Units are encouraged to laterally transfer used SCU within their organization and transfer excess secondary containment units, in good condition, to the Environmental Division, P2 Hand-Receipt Holder (270.798.3105). Transfer documentation is a DA Form 3161 through the unit's S-4/supply representative. Personnel with delegation of authority must hand-carry the document to the P2 Hand-Receipt Holder.

f. Condition of SCU. A broken or non-serviceable SCU will be taken off the unit/activities hand-receipt by presenting a DA Form 1348-1a to the Consolidated Installation Property Book Office (CIPBO, Building 5210)

**FORT CAMPBELL ENVIRONMENTAL HANDBOOK****Guidance and Instruction****ISSUANCE & USE OF A SECONDARY CONTAINMENT UNIT (SCU)**

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representative who will assign it a document number. Then the SCU and the DA 1348-1a, with "NON-SERVICEABLE" in Block # 16, will be taken to the regional Defense Reutilization & Marketing Office (DRMO) office (Building 5212, 8<sup>th</sup> Street and Arizona Ave) for turn-in. Insure that the SCU is clean and contains no residues of previous material before turn-in. The unit's S-4 office should be aware of these procedures.

g. Labeling on the SCU. SCU's used to store used oil/fuel or used antifreeze must be labeled or marked clearly with the words "Used Oil" or "Used Antifreeze." Stenciling is allowed, but do not paint the whole SCU. Remember, the SCU is installation property and is not deployed with the unit. Unit's signed for a SCU must secure it during deployments.

h. Condition of containers and SCU's. Used oil/fuel will be accumulated in DOT approved metal containers (drums). The containers will also be labeled IAW paragraph g. above. The Environmental Division's Pollution Prevention Operations Center (PPOC) located at 2nd and Wickham will provide all containers. Containers and SCU's used to store used oil/fuel must be:

1) In good condition (no severe rust, apparent structural defects or deterioration); and

2) Not leaking (no visible leaks).

i. Response to releases will be reported and clean-up procedures followed as established in the Spill Response and Notification Procedures or SPCC plan.

j. See Tab 14-2, Used POL Management for instructions for the Used POL Accumulation Site operations.

k. See Tab 21-5, Turn-in Procedures for Oil Filter Crushers.

**7. Additional Guidance:**

a. For additional guidance and information, and answers to your questions, please contact the program manager at 798-9786/9763.

b. For future reference, please place this document behind Tab 11 in your Fort Campbell Environmental Handbook.

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DEPARTMENT OF THE ARMY

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\_\_\_\_\_  
Fort Campbell, Kentucky 42223

AFZB-\_\_\_\_\_

\_\_\_\_\_  
Date

MEMORANDUM FOR Environmental Division, Pollution Prevention Branch

SUBJECT: Request Establishment of a Petroleum, Oil, and Lubricant (POL) Accumulation Point

1. Request establishment of the POL at the following unit/activity \_\_\_\_\_.
2. The estimated date of establishment will be \_\_\_\_\_.
3. This POL site is located in building \_\_\_\_\_ located near the intersection of \_\_\_\_\_.
4. The POL at this location will be used to accumulate POL waste IAW applicable regulations. All waste containers will be emptied by calling the PPOC at 2<sup>nd</sup> & Wickham Ave. (798.9790). Forward this memorandum to the Environmental Division's Pollution Prevention Branch (798.9763/9105) and place a copy in your site spill plan folder (SPCC). Secondary containment units (SCU) will be used at the site. POC for secondary container units (SCUs) is the Environmental Division (798.3105).
5. The Environmental Quality Officer (EQO) is \_\_\_\_\_ and can be contacted at phone number \_\_\_\_\_.
6. The point of contact for this memorandum is \_\_\_\_\_ and can be contacted at phone number \_\_\_\_\_.

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\_\_\_\_\_  
Commanding

\_\_\_\_\_  
\_\_\_\_\_  
Environmental Quality Officer